IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

WSOU Investments LLC	§	
doing business as	§	
Brazos Licensing and Development,	§	
	§	
Plaintiffs,	§	Civil Action No. 6:20-cv-00952-ADA
	§	Civil Action No. 6:20-cv-00953-ADA
v.	§	Civil Action No. 6:20-cv-00956-ADA
	§	Civil Action No. 6:20-cv-00957-ADA
Oneplus Technology (Shenzhen) Co., Ltd.,	§	Civil Action No. 6:20-cv-00958-ADA
	§	
Defendant.	§	Jury Trial Demanded
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	§	
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DECLARATION OF ELIZABETH M. CHIAVIELLO IN SUPPORT OF DEFENDANT'S MOTION TO DISMISS FOR INSUFFICIENT SERVICE OF PROCESS AND LACK OF PERSONAL JURISDICTION

- I, Elizabeth M. Chiaviello, declare:
- 1. I am an attorney duly admitted to practice law in Texas. I am an attorney in the law firm of Morgan, Lewis & Bockius LLP, counsel of record for Defendant OnePlus Technology (Shenzhen) Co., Ltd. ("Defendant") in the above-captioned action. I make this declaration based on my own personal knowledge and, if called to testify as to the truth of the matters declared herein, I could and would testify competently thereto.
- 2. Attached hereto as Exhibit 1 is a true and correct excerpt of https://www.hcch.net/en/instruments/conventions/status-table/print/?cid=17, a website provided by the Hague Conference on private international law listing contracting parties to the Hague Convention.
- 3. Attached hereto as Exhibit 2 is a true and correct copy of https://www.hcch.net/en/states/authorities/details3/?aid=243, a website provided by the Hague Conference on private international law detailing the Central Authority and practical information as to China's accession to Hague Convention.

4. Attached hereto as Exhibit 3 is a true and correct copy of https://travel.state.gov/content/travel/en/legal/Judicial-Assistance-Country-Information/China.html, a website provided by the U.S. State Department titled "China Judicial Assistance Information."

5. Attached hereto as Exhibit 4 is a true and correct copy of https://travel.state.gov/content/travel/en/legal/Judicial-Assistance-Country-Information/RussianFederation.html, a website provided by the U.S. State Department titled "Russia Judicial Assistance Information."

6. Attached hereto as Exhibit 5 is a chart summarizing the 192 court cases filed by WSOU Investments, LLC, including the Case Name, Date Filed, Docket No., and whether a Motion for Alternative Service has been filed.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and understanding.

Executed this 26th day of February, 2021.

Dated: February 26, 2021 RESPECTFULLY SUBMITTED,

MORGAN, LEWIS & BOCKIUS LLP

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